

### **Supplemental Declaration of Nick Horton**

1. My name is Nick Horton. I am the Co-Executive Director of OpenDoors, a non-profit organization founded in 2003, whose sole mission is to provide services to people with criminal records. I am providing this declaration to provide further information to the Court concerning OpenDoors' ability to serve and supervise immigration detainees released through the *Yanes v. Martin* class action litigation.
2. As of June 14, 2020, there are 8 vacancies available at OpenDoors' residential facility at 485 Plainfield Street, Providence, Rhode Island 02909. As I have stated in prior declarations submitted in this case, OpenDoors has extensive experience providing housing for formerly incarcerated persons, including those with a history of violence and substance abuse—including alcoholism.
3. As set forth in the program rules submitted along with my prior declarations, OpenDoors residents are prohibited from possessing or using illegal drugs, and must participate in random drug screening.
4. OpenDoors also has experience monitoring and ensuring tenants' abstinence from alcohol where so ordered by a Court or probation department as a condition of the individual's release from confinement. OpenDoors can and does take measures to supervise and enforce any orders requiring that a tenant abstain from alcohol. OpenDoors staff have the equipment and training to perform breathalyzer screening of a tenant if so ordered. To ensure compliance with any abstinence requirement, such screening can be performed as often as once per day—or even more if needed—and can be performed at randomized times of day.
5. OpenDoors staff also conduct daily check-ins with all tenants, which provides an additional opportunity for staff to interact with tenants and ensure that they are complying with the program's drug-free policy and any individualized release conditions concerning possession or consumption of alcohol.
6. Additionally, there are cameras on all doors at the Plainfield facility, and the security footage for those cameras is reviewed by OpenDoors staff on an ongoing basis to ensure that residents do not leave or enter the facility without specific authorization for a permitted activity (if any) in accordance with facility rules and individual conditions of release.
7. OpenDoors is well-equipped to serve monolingual Spanish-speaking tenants. I am conversant in Spanish and we have a case manager who is a fluent Spanish speaker.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of June, 2020, in Providence, Rhode Island

A handwritten signature in black ink, appearing to read "Nick Horton", positioned above a horizontal line.

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Nick Horton